

# EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD COLLEGE  
(HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-  
cv-14176-ADB

**DECLARATION OF JOHN DOE**

I, pursuant to 28 U.S.C. § 1746, declare the following:

1. I am an individual over eighteen years old and of sound mind, who has never been convicted of a felony, is capable of making this declaration, and is fully competent to declare as to matters stated herein.

2. I work in New York and am the father of one child who is almost six years old. My family lives in the New York area. I hope that as my son applies to schools in the future, he will not be subjected to the same discriminatory standards that Asian Americans face today.

3. I joined Students for Fair Admissions (“SFFA”) because I believe that Harvard College and many other colleges and universities wrongly discriminate against Asian-American students. In my view, colleges and universities require Asian-American students to have much higher test scores and grade point averages to gain admission than other students. I view this requirement to be unfair.

4. I am a member of SFFA, and I actively follow its activities. Last year, I worked with Edward Blum to arrange a meeting with the Long Island Chinese Community. In the past year, I have contributed a total of \$120 to support SFFA's mission.

5. I participate as an SFFA member because I support its work in defeating affirmative action policies that unlawfully discriminate against Asian-American students.

6. I am aware that SFFA advocates positions that are adverse to Harvard and are also disfavored by many people, including some of my professional colleagues.

7. When I joined SFFA, I expected that my identity and involvement in SFFA would remain confidential. The website on which I registered stated that my membership would not be disclosed, which was important to my decision to join. Thus, despite its unpopularity, I felt safe participating in SFFA only because I believed that my identity would remain confidential.

8. I do not want the public to know about my involvement in SFFA. If it becomes public that I am a member of SFFA, I fear that it could damage my reputation and cause colleagues at work to view me in a negative light.

9. I also do not want anyone at Harvard to know that I am a member of SFFA. I hope that my son can someday attend Harvard and fear that if Harvard knew that I opposed its undergraduate admissions policies, then it might later retaliate against me by denying admission to my son.


10. Although I support SFFA's litigation against Harvard, I do not want to have any personal involvement in it. I am making this declaration with the understanding that it will remain anonymous and that my identity will not be disclosed.

11. For these reasons, if my identity as a member of SFFA is disclosed to Harvard and its attorneys in this litigation, then it will deter me from participating in SFFA, contributing

money to it or paying membership dues, interacting with other members, or communicating with the group's leadership. I would not have joined as a member of SFFA if I knew that my name would be disclosed to Harvard.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, April 28, 2016.

  
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John Doe